

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Luke S Goss and Tiara R Goss  
Debtors  
Lakeview Loan Servicing, LLC, or its Successor  
or Assignee

Movant

vs.

Luke S Goss and Tiara R Goss  
Jack N Zaharopoulos  
Respondents

Chapter 13

Bankruptcy No. 1:21-bk-00290-HWV

**SETTLEMENT STIPULATION**

WHEREAS, on February 13, 2021, Luke S Goss and Tiara R Goss (the "Debtors") filed a Petition under Chapter 13 of the Bankruptcy Code in the United States Bankruptcy Court for the Middle District of Pennsylvania;

WHEREAS, on July 28, 2022, Lakeview Loan Servicing, LLC (Movant) filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. Section 362(a) (the "Motion") regarding property located at: 213 Ginger Lane, Mifflintown, Pennsylvania 17059;

WHEREAS, Movant and the Debtors are desirous of settling the dispute among and between themselves;

NOW THEREFORE, each in consideration of the promises of the other and intending to be legally bound, subject to the approval of the Bankruptcy Court, it is hereby agreed by and among counsel for Movant, by and through its attorneys, MARGARET GAIRO, ESQUIRE, MARISA M. COHEN, ESQUIRE, and ANDREW M. LUBIN, ESQUIRE, and the Debtors, by and through their counsel, Donald Zagurskie, Esquire ("Debtors' Counsel") as follows:

1. The parties hereby certify that the post-petition delinquency is \$4,044.68, consisting of post-petition payments for the months of June 1, 2022 through September 1, 2022. Debtors' monthly mortgage payment is \$1,011.17. Movant has incurred attorney fees and costs totaling \$838.00, thereby increasing the post-petition arrears to \$4,882.68.

2. On or before September 23, 2022, the Debtor shall make a payment of \$4,882.68 payable to Movant, LoanCare, LLC, P.O. Box 8068, Virginia Beach, VA 23450, thereby reducing the post-petition arrearage to \$0.00.

3. Debtor shall resume making regular monthly mortgage payments in the amount of \$1,011.17 beginning on October 1, 2022

4. All payments are to be made payable to Lakeview Loan Servicing, LLC at the following address: LoanCare, LLC, P.O. Box 8068, Virginia Beach, VA 23450.

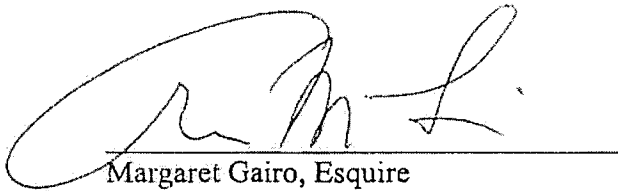
5. The last four digits of your loan number 9507. Please remember to write your entire account number on the lower left-hand corner of your payment to ensure proper processing.

6. Should Debtors fail to comply with any of the terms of this Stipulation, including but not limited to, failure to make the above described payments, or any regular monthly mortgage payment commencing after the cure of the post-petition delinquency, then Movant may send Debtors and counsel a written notice of default of this Stipulation. If the default is not cured within ten (10) days of the date of the notice, counsel for Movant may file a Certification of Default with the Court. Said Certification of Default may include a certification of Debtors' failure to pay subsequent payments that fall due after the date of the notice of default. Upon Certification, the Court shall enter an Order granting relief from the automatic stay as to the mortgaged property.

7. In the event the Debtors convert their case to Chapter 11, the terms of this Stipulation shall remain in full force and effect. In the event that Debtors convert their case to a Chapter 7, Debtors shall cure all pre-petition and post-petition arrears within ten (10) days of the date of conversion. Failure to cure the arrears shall constitute an event of default under this Stipulation and Movant may send Notice of Default and certify default as set forth in the preceding paragraph.

8. Attorney fees and costs for issuing Notice to Cure, Notice / Certificate / Affidavit of Default, and order for relief are recoverable and may be added to the arrearage.

9. Counsel for Debtor has authority to settle this matter on behalf of his/her clients.



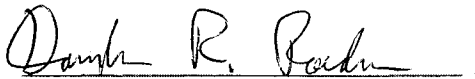
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9/9/2022  
Date



Donald Zagurskie  
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Attorney for Debtors

9/8/22  
Date



Douglas R. Roeder, Staff Attorney  
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Standing Chapter 13 Trustee  
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Trustee

9/9/2022  
Date: